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6
UNITED STATES DISTRICT COURT
 7 **DISTRICT OF NEVADA**

8
 9 UNITED STATES OF AMERICA,) **No.**
 10 Plaintiff,) MOTION TO SEAL AND
 11 v.) [PROPOSED] SEALING ORDER
 12 CARMELO MEDINA-MEDINA and)
 13 ENRIQUE SALAS-RAMIREZ,)
 14 Defendants.) **3:10-cr-00076-ECR-VPC**

15 COMES NOW, the United States of America, by and through its attorneys, DANIEL G.
 16 BOGDEN, United States Attorney for the District of Nevada, and James E. Keller, Assistant United States
 17 Attorney, and moves for the sealing of the Indictment returned by the Grand Jury on or about June 30, 2010,
 18 in the above-captioned action, any arrest warrant and corresponding indictment paperwork, this instant
 19 motion to seal, and any corresponding Sealing Order until further Order of the Court.

20 The government is presently entertaining the submission of applications to the Court for the
 21 search of two premises on Tybo Avenue, in Reno, Nevada, where defendants, or at least drug associates
 22 of the defendants, are believed to reside. Further, these premises, at 2290 Tybo Avenue and 2240 Tybo
 23 Avenue, respectively, are two locations where DEA agents believe controlled substances are stored and/or
 24 distributed. If the indictment against these defendants and corresponding indictment paperwork are
 25 revealed in the above-captioned action, it will likely cause them, as well as any individuals at either of these
 26 two premises, to flee or to conceal or destroy contraband (such as drugs) prior to the execution of search
 27 warrants, if any, at either premises. Such a response would jeopardize any potential for success as to
 28 execution of search warrants at either of these two premises and hinder the pending investigation into these

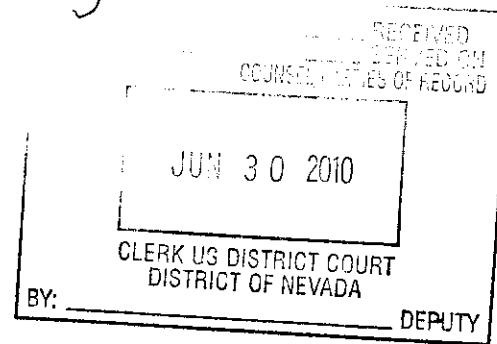
1 two premises, as well as the individuals in terms of drug activity, led by DEA. In addition, the government
2 represents that DEA agents have identified measures taken on the part of at least one of the defendants to
3 conceal drug activity. For instance, the drugs relating to the charges in the indictment in the instant case
4 were recovered from a concealed compartment put in there by one of the defendants. Accordingly, the
5 government moves to seal the indictment returned by the Grand Jury on or about June 30, 2010, in the
6 above-captioned action, any arrest warrant and corresponding indictment paperwork, this instant motion
7 to seal, and any corresponding Sealing Order until further Order of the Court. Finally, the government
8 represents that it will not unduly delay in determining whether to seek these search warrants and that, once
9 the named defendants are arrested and before the Court, the government will move to unseal the indictment
10 in this action.

11 DATED this 30th day of June, 2010

Respectfully Submitted,

12 DANIEL G. BOGDEN
13 United States Attorney

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15 JAMES E. KELLER
16 Assistant U.S. Attorney



UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

3:10-cr-00076-ECR-VPC

UNITED STATES OF AMERICA,) No.
Plaintiff,) SEALING ORDER
v.)
CARMELO MEDINA-MEDINA and) UNDER SEAL
ENRIQUE SALAS-RAMIREZ,)
Defendants.)

Based upon the motion dated June 30, 2010, by the government, the representations made therein, and good cause showing, IT IS HEREBY ORDERED that the indictment, any arrest warrant and corresponding indictment paperwork, the government's motion dated June 30, 2010, and this Order be SEALED until further Order of the Court.

IT IS SO ORDERED.

Dated this 30 day of June, 2010.


HON. ROBERT A. MCQUAID, JR.
UNITED STATES MAGISTRATE JUDGE